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STATE OF MARYLAND * NO. C-10-CR-21-000535
v. * IN THE CIRCUIT COURT FOR
NORRIS BERNARD ELLIS * FREDERICK COUNTY, MD

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STATE'S REQUEST FOR VOIR DIRE EXAMINATION

COMES NOW the State of Maryland, by and through Tammy M. Leache, and Carly Gibson, Assistant State's Attorneys for Frederick County, and respectfully requests this Honorable Court to propound the following questions to the Jury Panel for their examination on Voir Dire:

QUESTIONS

1. Does any member of the prospective Jury Panel know the Defendant, Norris Bernard Ellis?

2. Does any member of the prospective Jury Panel know any member of the Defendant's family?

3. Does any member of the prospective Jury Panel know the Defendant's attorneys, Benjamin M. Kurtz, or the Assistant State's Attorney for Frederick County, Tammy M. Leache and Carly Gibson?

4. Does any member of the prospective Jury Panel know the following witness who may be called to testify in this case:

*See attached witness list

5. This case involves allegations of a forcible rape that occurred in an alley near Carroll Creek in downtown Frederick on or about July 4, 2021. Is there any member of the prospective Jury Panel who has heard or read anything about the facts in this case before coming into the courtroom today?

6. Is there any member of the prospective Jury Panel who has formed an opinion as to the guilt or innocence of Norris Bernard Ellis, the Defendant?

7. Has any member of the prospective Jury Panel or a member of your family ever been the subject of a criminal investigation or a defendant in a criminal or serious traffic case in Maryland or any other State? The term “serious traffic case” would include, but is not limited to, a charge of Driving While Intoxicated or Under the Influence of Alcohol, Driving While Suspended or Revoked, Hit and Run, and Fleeing and Eluding.

8. Has any member of the prospective Jury Panel or your family ever been accused of committing a crime?

9. Has any member of the prospective Jury Panel or a member of your family ever testified as a witness in a criminal case in Maryland or any other State?

10. Does any member of the prospective Jury Panel or a member of your family have any political, religious or philosophical beliefs about our system of criminal justice that would make him or her hesitate to sit as a juror in this case?

11. Does any member of the prospective Jury Panel have any physical or emotional impairment which could affect his or her ability to listen to and consider all of the evidence admitted in this case, including, but not limited to, any hearing, visual, speech or physical impairment which could affect his or her ability to sit for a long period of time?

12. Does any member of the prospective Jury Panel have any prejudice for or against members of law enforcement or police agencies merely because they are employed as police officers?

13. Is there any member of the prospective Jury Panel who would allow the possible

punishment of Norris Bernard Ellis, the Defendant, to influence his or her verdict in this case?

14. The State intends to prove Norris Bernard Ellis, the Defendant, guilty beyond a reasonable doubt. Is there any member of the prospective Jury Panel who feels the State must prove its case beyond all doubt or to a mathematical certainty?

15. This case will involve testimony of graphic sexual acts and the use of force. Is there any member of the prospective jury who would be unable to listen to evidence of this nature?



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